



**United States Department of Justice**

*United States Attorney  
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April 19, 2017

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The Clinton Exchange, 3rd Floor  
4 Clinton Square  
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[VIA FEDERAL EXPRESS]

Kimberly M. Zimmer, Esq.  
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The University Building  
120 E. Washington Street, Suite 815  
Syracuse, New York 13202

Re: United States v. Justin Crandall & Jessica Crandall, [3:17-CR-63 (TJM)]

Dear Counselors:

This letter memorializes and confirms copies of additional materials which are hereby being provided to you in connection to this case. I recently received these materials. The materials are contained on 1 CD/DVD and are hereby being sent to you via Federal Express. Please be advised that all the items, evidence, photographs/images, videos, audios, recordings, information, reports, materials, statements and things identified and discussed on the CD/DVD as well as below will be offered into evidence at the trial.

On the enclosed CD/DVD you will find 10 digital files containing hundreds of pages of materials.

Enclosed you will find the following materials:

1. Google Inc. materials [contained in 3 digital files].
2. Delaware County CPS reports, records, and documents [contained in 4 digital files].
3. New York State OCFS reports, records, and documents [contained in 3 digital files].

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Pursuant to the Criminal Pre-Trial Order issued in this case and Rules 16 and 12 of the Federal Rules of Criminal Procedure, the government hereby requests reciprocal discovery from defendants. Also, pursuant to Rule 12.1 of the Federal Rules of Criminal Procedure, the government requests any and all alibi notice as required by the federal rules. Finally, pursuant to the rules, we request notice of any expert witness that the defense intends to call at trial whether it pertains to the guilt phase or the sentencing phase.

Sincerely,

RICHARD S. HARTUNIAN  
United States Attorney

*Miroslav Lovric*  
Assistant U.S. Attorney

cc: United States District Court, ECF

CERTIFICATE OF SERVICE FOR ELECTRONIC CASE FILING SYSTEM

I hereby certify that on April 19, 2017, I electronically filed with the NDNY Clerk of the District Court using the CM/ECF system the above-referenced document(s) in connection with the above-referenced case. The CM/ECF system automatically sent electronic notifications of such filing to the attorneys of record in this case, as maintained by the District Court Clerk's Office, AND who are properly registered in the CM/ECF system for the NDNY as required pursuant to NDNY General Order #22. As for any attorney of record in this case who is not registered in the CM/ECF system for the NDNY, the government has caused to be mailed or faxed to that attorney either the actual CM/ECF electronic notification/e-mail as received from the CM/ECF system by the government and/or the actual documents being filed. Therefore, the non-registered attorney(s) will receive the same electronic ECF notice with the same information as will the attorney(s) who is/are registered in the CM/ECF system.

*Miroslav Lovric*

Assistant U.S. Attorney